



28237 La Piedra Road, Menifee Ca 92584
Telephone (951) 672-2400 Fax (951) 672-6060

FAX COVER SHEET

To: FCC - Appeal USAC Decision

Fax # 973-599-6542

From: David Graves, Chief Business Officer

Date: 4/11/13

Pages: 7, including cover sheet

Pages 2 - 5 are my appeal. Pages 6 - 7 is the denial letter
from USAC to consider my appeal.

If you have any questions, please call (951) 672-2400,
Thank you.

Email: dgraves@sra.mn

P.N. 951-672-2400 #201



Santa Rosa Academy

A Public Charter School in Menifee, California

28237 La Piedra Road, Menifee, CA 92584

Telephone: (951) 672-2400 #201

Fax: (951) 672-6060

March 13, 2013

Appellant/Organization Name: Santa Rosa Academy

Contact Mailing Address: 28237 La Piedra Road; Menifee, CA 92585

Contact Phone Number: (951) 672-2400 #201

Fax Number: 951-672-6060 E-Mail: dgraves@sra.mn

Dear Sir or Madam:

I'm the contact person for Santa Rosa Academy (SRA) and I mistakenly cancelled funding request #2298282 from application number 845984 for funding year 2012.

The funding request number 2298282 is for T-1 lines that are being provided by Verizon; when I applied on the 471 application, I had two funding requests for this service. The first was approved and is funding request #2297991. Since SRA's contract with Verizon for T-1 lines expires in March and goes month to month thereafter, I had submitted 2 funding requests.

The reason it got cancelled is because I received a letter from the PIA team dated 8/16/2012 that I've enclosed with this letter. Apparently, I thought at the time that I'd made a duplicate entry but realize now that the reason for this funding request is because the contract expires in March and I had month to month services for the remaining year. I had properly posted this service on form 470 application number 153670000975680 for funding year 2012 for 28 days and determined that going month to month with Verizon for our T-1 lines, when the existing contract expires, would be the best option for Santa Rosa Academy.

In summary, please approve Funding Request Number 2298282.

Sincerely,

David Graves, CPA

Chief Business Officer



Schools and Libraries Division

Aug 16, 2012

David Graves
SANTA ROSA ACADEMY
Telephone:
Application Number

(951) 6722400
845984

Response Due Date: 8/31/2012

The Program Integrity Assurance (PIA) team is in the process of reviewing all Funding Year 2012 FCC Form 471 Applications to ensure that they are in compliance with the rules of the Universal Service program. We are currently in the process of reviewing your Funding Year 2012 FCC Form 471 Application. To complete our review, we need some additional information. The information needed to complete the review is listed below.

- I. Based on the review of your Funding Year 2012 FCC Form 471 application **845984**, for FRN(s) **2298038**, the documentation provided in your Item 21 Attachments is not sufficient to determine the eligibility of your request. The documentation indicates that your request includes the following items: **Total Voice Additional Service and Taxes, Fees and other charges**. The documentation does not clearly identify the products or services related to these charges. Please provide more detailed documentation, such as the portion of the bill that identifies the actual products and services relating to the charges identified above. If the bill you receive does not identify the specific products and services being delivered, you will need to contact your vendor and request such documentation. The telecommunications carrier should be able to provide you with a detailed statement identifying the specific products and services being provided, which is sometimes called a Bill Breakdown or Detailed Charge Report with Service Descriptions. If your service provider cannot provide you with such a statement, please have them provide you with itemized billing or documentation that specifically details the services being delivered.

Please provide a list of all additional voice services included in this FRN for \$49.50. Also, please provide a list of all taxes, fees and other charges included in this FRN for \$147.48. Sent back-up documentation to Panchal, Vibhuti on 8/16/2012.

Please keep in mind that your supporting documentation should be the documentation or data used to prepare your FCC Form 471 application and should clearly identify any ineligible charges that were cost allocated out of your request. If you are unable to justify the charges requested on your FCC Form 471, the request may be reduced or denied.

- II. Based on documentation that you provided during the review of your Funding Year 2012 FCC Form 471 **845984**, we have determined that FRN **2298018** includes ineligible items. According to Program rules, USAC is unable to fund ineligible products or services. The charges associated with ineligible items must be identified and removed from the funding request. Listed below are the ineligible items and their associated costs:

5 IP Addresses Online Backup and Sharing / 50GB - \$26.99

Please confirm that you agree with the cost allocation and that the ineligible item(s) should be removed from the FRN. X Yes or No

COMMENT: I wasn't aware that this is an ineligible cost. As it appears from your letter that it is, then please remove.

- III. Based upon our review of your Funding Year 2012 FCC Form 471 application number **845984**, FRN **2298282** is listed as a tariff (T) or month-to-month (MTM) service, and Funding Year **2011** FCC Form 470 # **792030000885944** is referenced as the FCC Form 470 that established the 28-day competitive bidding period for this service. The Program rules require that services delivered on a tariff or month-to-month basis be posted for at least 28-Days to a new FCC Form 470 each Funding Year. **Since the referenced FCC Form 470 was not filed in the same Funding Year as the FCC Form 471, your funding request is in violation of the competitive bidding requirements relating to tariff and month-to-month services.** To assist us in completing the review of your FCC Form 471 application, please answer the following questions and provide supporting documentation.

Is there a Funding Year 2012 FCC Form 470 that established the 28-day competitive bidding period for this tariff or month-to-month service?

No. Somehow, FRN 2298282 for \$1,386.80 in monthly charges and FRN 2297991 for \$1,386.80 are for the same service? **PLEASE REMOVE FRN 2298282.** I'm not sure how this happened. Perhaps I deleted it but it still showed up on the form 471. The reason I have this theory is I don't think FRN 2298282 is part of the total \$31,149 figure found on page 17 on the "Total funding year pre-discount amount on this form 471 and the entries from items 23I on all Block 5 discount funding requests".

 YES. If so, please provide the 15-digit FCC Form 470 Number that established the 28-day competitive bidding period for this service. The establishing FCC Form 470 is the specific FCC Form 470, which was posted to the USAC website for the services requested for at least 28 days, and pursuant to which a contract was signed or an agreement was entered into with a service provider for that service. For a request in the Basic Maintenance of Internal Connections (BMIC) service category that was filed prior to May 1, 2005, it is possible that the establishing FCC Form 470 was filed under the Internal Connections service category (prior to May 1, 2005 the BMIC service category did not exist on the FCC Form 470). Please note that the establishing FCC Form 470 could have been posted by your State if the requested services are being purchased off of a State Master Contract. Please indicate if this is the case.

If a Funding Year 2012 FCC Form 470 was not filed to establish the 28-day competitive bidding period for this service, please indicate this in writing.

For additional information on the competitive bidding process, please see <http://www.usac.org/sl/applicants/step03/default.aspx>.

Please fax or email the requested information to my attention. If you have any questions or if you require a further explanation of this request, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review. **Failure to respond may result in a reduction or denial of funding.** If you need additional time to prepare your response, please let me know as soon as possible.

Should you wish to cancel your FCC Form 471 application(s), or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s). Include in any cancellation request the FCC Form 471 application number(s) and/or funding request number(s), and the complete name, title and signature of the authorized individual.

Thank you for your cooperation and continued support of the Universal Service Program.

Vibhuti Panchal
Associate Manager, PIA Reviewer
30 Lanidex Plaza West | Parsippany, NJ 07054
T: 973.581.7689 | F: 973.599.6578
vpancha@sl.universalservice.org

David Graves
Santa Rosa Academy
28237 La Piedra Road
Menifee, CA 92584

Billed Entity Number: 16055922
Form 471 Application Number: 845984
Form 486 Application Number:



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2012-2013

March 26, 2013

David Graves
Santa Rosa Academy
28237 La Piedra Road
Menifee, CA 92584

Re: Applicant Name:	SANTA ROSA ACADEMY
Billed Entity Number:	16055922
Form 471 Application Number:	845984
Funding Request Number(s):	2298282
Decision Letter Date:	September 25, 2012
Date Appeal Postmarked:	March 13, 2013
Your Correspondence Dated:	March 13, 2013

Our records show that your appeal was postmarked more than 60 days after the date your Funding Commitment Decision Letter was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

Schools and Libraries Division
Universal Service Administrative Company